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SEAGATE TECHNOLOGY LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

16 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DEFENDANT SEAGATE TECHNOLOGY
LLC'S NOTICE OF COMPLIANCE
WITH ORDER RESOLVING
ADMINISTRATIVE MOTIONS TO FILE
UNDER SEAL (Dkt. 199)**

Place: Courtroom G
Judge: Hon. Joseph C. Spero

Second Consolidated Amended Complaint
filed: July 11, 2016

1 Defendant Seagate Technology LLC hereby submits the following response and supporting
 2 documents in compliance with the Court's Order Resolving Administrative Motions to File Under
 3 Seal, filed January 22, 2019 (Dkt. 199).

4 **A. Seagate's Consolidated Renewed Motion (Dkt. 184)**

- 5 • Exhibit C: DENIED only as to the proposed redaction of the two words "except for" on
 6 the final page, the redaction of which would render the public version misleading without
 7 compelling reasons to do so. GRANTED as to all other proposed redactions. **Newly**
 8 **redacted document submitted herewith.**
- 9 • Exhibit G: DENIED as to paragraph 42 except that Seagate may redact the words
 10 between "distribution drives" and "because" in the currently proposed redaction.
 11 DENIED as to footnote 17 except that the final sentence proposed to be redacted
 12 therein may remain redacted. DENIED as to the first phrase of paragraph 188, ending
 13 with the first comma. DENIED as to the clause after the comma in paragraph 190.
 14 GRANTED as to all other proposed redactions. **Newly redacted document**
 15 **submitted herewith.**
- 16 • Exhibit I: DENIED as to paragraph 95(e). GRANTED as all other proposed
 17 redactions. **Newly redacted document submitted herewith.**
- 18 • Exhibit BB: DENIED as to pages FED_SEAG0072039 and FED_SEAG0072042.
 19 Seagate may redact the names of nonparties on those pages if it is required to do so
 20 by confidentiality agreements. GRANTED as to all other pages. **Newly redacted**
 21 **pages FED_SEAG0072039 and FED_SEAG0072042 submitted herewith.**
- 22 • Exhibit CC: DENIED as to pages FED_SEAG0072015 and FED_SEAG0072018
 23 through -72020. Seagate may redact the names of nonparties on those pages if it is
 24 required to do so by confidentiality agreements. GRANTED as to all other pages.
 25 **Newly redacted page FED_SEAG0072015 and unredacted pages**
 26 **FED_SEAG0072018-72020 submitted herewith.**

- No later than February 12, 2019, Seagate shall file unredacted in the public record: (1) the declaration of Glen Almgren; (2) the declaration of Itamar Simonson; (3) exhibits 8-14, 16, and 19-21 to the declaration of Li  n Payne; and exhibits H and L to the June 11, 2018 declaration of Tenaya Rodewald.
- Declaration of Glen Almgren—**filed unredacted in the public record.**
- Declaration of Itamar Simonson—**filed unredacted in the public record.**
- Exhibits 8-14, 16, and 19-21 to the Declaration of Li  n Payne—**filed unredacted in the public record.**
- Exhibits H and L to the June 11, 2018 Declaration of Tenaya Rodewald—**filed unredacted in the public record.**

B. Plaintiffs’ October 15, 2018 Motion to File Documents Under Seal (Dkt. 189)

- Exhibit 14: DENIED except that Seagate may redact customers’ personal information. **Newly redacted document submitted herewith.**
- EXHIBIT 25: DENIED except as to Seagate’s proposed redaction of “portions that reference testing procedures, as opposed to mere testing results.” Because this description is vague and Seagate has not provided specific proposed redactions, the Court reserves the right to revisit this issue after Seagate files a public version of this exhibit. **Newly redacted document submitted herewith.**
- EXHIBIT 28 & 50: DENIED. Seagate’s speculative and conclusory assertion that these public relations discussions “could be used against Seagate by its competitors” does not establish compelling reasons for sealing, and no such reasons are apparent from the face of these documents. Seagate may redact individual employees’ contact information if it so chooses. **Newly redacted documents submitted herewith.**

- EXHIBIT 44 & 46: DENIED except as to the “confidential portions” identified by Seagate, which may be redacted. Because Seagate’s description is vague and Seagate has not provided specific proposed redactions, the Court reserves the right to revisit this issue after Seagate files a public version of these exhibits. **Newly redacted documents submitted herewith.**

Dated: February 8, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By */s/ Anna S. McLean*

ANNA S. McLEAN

Attorneys for Defendant

SEAGATE TECHNOLOGY LLC